



U.S. Department
of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628
609.771.7800

WARNING LETTER

VIA ELECTRONIC MAIL TO: trusso@buckeye.com

May 4, 2026

Todd Russo
President and Chief Executive Officer
Buckeye Partners, LP
4200 Westheimer Road #975
Houston, Texas 77027

CPF 1-2026-052-WL

Dear Mr. Russo:

From March 17 through November 13, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of Title 49 United States Code (U.S.C.), conducted an integrated inspection of Buckeye Partners, LP's (Buckeye) facilities in Jacksonville, Florida.

As a result of the inspection, Eastern Region alleges that Buckeye has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) Part 195. The item inspected and the probable violation is:

1. **§ 195.440 Public awareness.**
 - (a) ...
 - (c) **The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.**

Buckeye failed to follow the general program recommendations, including baseline and supplemental requirements, of the American Petroleum Institute's (API) Recommended Practice (RP) 1162 in its Public Awareness Program (PAP), and failed to provide justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice would not be practicable and would not be necessary for safety, in accordance with section 195.440(c). Specifically, Buckeye failed to follow the recommendations of section 8.3 in API RP 1162, which required measuring the development and implementation of the PAP.

Section 8.3 in API RP 1162 required the operator to complete an annual audit or review of the PAP's development and implementation.

During the inspection, PHMSA personnel requested records pertaining to Buckeye's annual PAP implementation review. Buckeye provided an annual review work order (WO) for each calendar year from 2022 to 2024 and a log with annual revisions to its Public Awareness Manual. All annual work orders were completed using a Management System for Maintenance Work Orders and listed "Review Manual" as the type of work.

Work Order 2057801 dated June 23, 2023, and Work Order 2203113, dated September 20, 2024, listed the Public Awareness Manual sections and whether changes were necessary for each section. However, the WOs failed to include any details regarding the reasoning behind why changes were deemed necessary for certain sections. Therefore, Buckeye failed to record whether the PAP had been implemented and documented according to the written program in accordance with section 8.3 in API RP 1162. Further, no specific measures listed in Appendix E in API RP 1162 were presented to demonstrate auditing of the program implementation.

Therefore, Buckeye failed to follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, in accordance with section 195.440(c).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violations occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violations occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violations occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violations occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violations occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violations occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per

violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so may result in Buckeye Partners, LP being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2026-052-WL**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Sincerely,

ROBERT
THOMAS
BURROUGH

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THOMAS BURROUGH
Date: 2026.05.04 12:52:17
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Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Mark Copeland, Manager, Pipeline Safety & DOT Compliance,
mcpeland@buckeye.com
Robert Osika, Director, DOT Compliance, rosika@buckeye.com